

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

**UNITED STATES OF AMERICA**

**Plaintiff,**

**v.**

**MARCO ANTONIO VALLEJO, JR.**

**Defendant.**

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**No. EP-17-CR-1568 FM**

**DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant MARCO ANTONIO VALLEJO, JR., by and through his attorney of record, Ruben Nunez, and moves this Court to grant him permission to travel to the Republic of Mexico, and would show the Court the following:

**I.**

The Defendant is currently under pretrial release on a \$10,000, 10% Appearance Bond. The Pretrial Services Office has authority to grant or deny any requests by Defendant for temporary travels outside of El Paso County, Texas. However, the Defendant is not allowed to travel to Mexico or any other foreign country.

**II.**

The Defendant’s maternal grandmother passed away on September 9, 2017 in Austin, Texas. Her remains have been brought back to Ciudad Juarez. The Defendant requests permission to travel to Ciudad Juarez, Mexico on Sunday, September 24, 2017 to attend her mass, funeral services and family gathering. The Defendant would be accompanied by his father, mother and two sisters. He seeks to travel from 8:00 a.m. on

Sunday and return by 11:00 p.m. that same day. The Defendant would then report to his Pretrial Services Officer on Monday morning, or as instructed.

III.

The undersigned has conferred with U.S. Pretrial Services Officer Irma Portillo, who has advised the undersigned that the Defendant has been compliant with all his conditions of pretrial release, and that she does not oppose this motion.

IV.

The undersigned has also conferred with Assistant United States Attorney Mallory Rasmussen, who advised the undersigned that she does not oppose this motion.

WHEREFORE THE ABOVE PREMISES CONSIDERED, the Defendant respectfully requested that the Court grant this motion and permit the Defendant to travel to Ciudad Juarez, Chihuahua, Mexico as requested in this motion.

Respectfully submitted,

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/s/ **Ruben Nuñez**  
RUBEN NUNEZ  
State Bar No. 00794909  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I, RUBEN NUNEZ, hereby certify that a true and correct copy of the above and foregoing motion was filed on September 22, 2017, with the United States District Clerk for the Western District of Texas using CM/ECF System, which will give notice to Mr. John Johnston, Assistant United States Attorney, 700 E. San Antonio, El Paso, Texas 79901.

/s/ **Ruben Nuñez**  
RUBEN NUNEZ